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*Lead Counsel for Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master No.: 3:07-cv-05944-SC  
MDL No. 1917

This Document Relates to:

ALL INDIRECT-PURCHASER ACTIONS

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*  
Case No. 3:11-cv-05513

*Best Buy Co., Inc., et al. v. Technicolor SA, et al.,*  
Case No. 13-cv-05264

*Costco Wholesale Corporation v. Hitachi, Ltd., et*  
*al., No. 11-cv-06397*

*Costco Wholesale Corporation v. Technicolor SA,*  
*et al., No. 13-cv-05723*

*Interbond Corp. of America v. Hitachi, Ltd., et al.,*  
Case No. 3:11-cv-06275

*Interbond Corp. of America v. Technicolor SA, et*  
*al., Case No. 3:13-cv-05727*

*Office Depot, Inc. v. Hitachi, Ltd., et al., Case No.*  
*3:11-cv-06276*

*Office Depot, Inc. v. Technicolor SA, et al., Case*  
*No. 3:13-cv-05726*

**DECLARATION OF LAUREN  
C. CAPURRO IN SUPPORT OF  
PLAINTIFFS'  
ADMINISTRATIVE MOTION  
TO FILE DOCUMENTS  
UNDER SEAL PURSUANT TO  
CIVIL LOCAL RULES  
7-11 AND 79-5**

Date: February 6, 2015  
Time: 10:00 a.m.  
Place: Courtroom 1

The Honorable Samuel Conti

1 *Sears, Roebuck and Co., & Kmart Corp. v.*  
2 *Chunghwa Picture Tubes, Ltd., et al.*, No. 11-cv-  
3 05514-SC

4 *Sears, Roebuck and Co. and Kmart Corp. v.*  
5 *Technicolor SA*, No. 3:13-cv-05262

1 I, Lauren C. Capurro, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to  
3 practice before this Court. I am an associate with the law firm Trump, Alioto, Trump &  
4 Prescott, LLP and my firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs  
5 (“Plaintiffs”) in the above-captioned action. I make this declaration in support of the  
6 Plaintiffs’ Administrative Motion to File Under Seal Pursuant to Civ. L. R. 7-11 and 79-  
7 5(d). Except where otherwise stated, the matters set forth herein are within my personal  
8 knowledge and if called upon and sworn as a witness I could competently testify regarding  
9 them.

10 2. On June 18, 2008, the Court approved a “Stipulated Protective Order” in  
11 this matter (Dkt. No. 306) (the “Protective Order”).

12 3. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d),  
13 Plaintiffs seek to file the following documents under seal:

14 a. The highlighted portions of Plaintiffs’ Opposition to Defendants’  
15 Motion for Partial Summary Judgment on Indirect Purchaser Claims  
16 Based on Foreign Sales;

17 b. The highlighted portions of the Declaration of Mario N. Alioto In  
18 Support of Plaintiffs’ Opposition to Defendants’ Motion for Partial  
19 Summary Judgment on Indirect Purchaser Claims Based on Foreign  
20 Sales (the “Alioto Declaration”); and

21 c. Exhibits 2-17, 19-145, and 148 to the Alioto Declaration.

22 4. The documents or portions of documents that Plaintiffs seek to file under  
23 seal contain either (a) material designated by Defendants pursuant to the Stipulated  
24 Protective Order as “Confidential” or “Highly Confidential” or (b) analysis of, references  
25 to, or information taken directly from material designated by Defendants pursuant to the  
26 Stipulated Protective Order as “Confidential” or “Highly Confidential.”

27 //  
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1 I declare under penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct. Executed this 23rd day of December, 2014 at San Francisco,  
3 California.

4 /s/ Lauren C. Capurro  
5 Lauren C. Capurro  
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